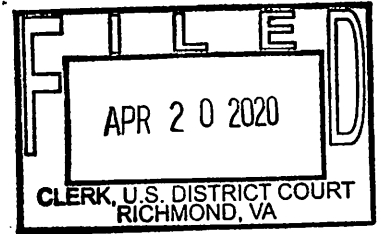


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division



GREGORY CONTE AND WARREN BALOGH,

Plaintiffs,

v.

Case No. 3:19-cv-00575-MHL

COMMONWEALTH OF VIRGINIA AND
TERENCE R. MCAULIFFE AND VIRGINIA
STATE POLICE AND STEVEN FLAHERTY
AND BRIAN JOSEPH MORAN AND BECKY
CRANNIS-CURL AND CITY OF
CHARLOTTESVILLE AND MICHAEL
SIGNER AND WES BELLAMY AND
CHARLOTTESVILLE POLICE DEPARTMENT
AND AL THOMAS, JR.,

Defendants.

PLAINTIFFS' MOTION TO EXTEND TIME TO SUBMIT RESPONSE TO DEFENDANTS'
MOTIONS TO DISMISS

COMES NOW Plaintiffs Gregory Conte and Warren Balogh, *pro se*, to move for an extension to respond to Defendants' Motions to Dismiss (filed March 3, 2020) of thirty (30) days beyond the usual 21-day deadline and two fourteen-day extensions granted by Court's General orders 2020-03 and 2020-07.

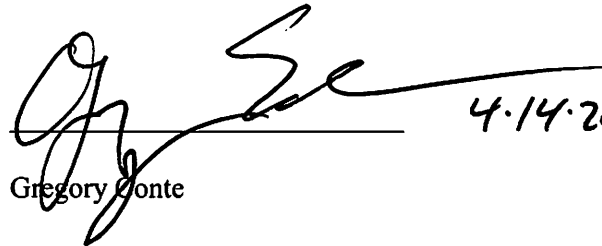
Plaintiffs are making this request because the eruption of COVID-19 and the concomitant Declaration of National Emergency have hindered plaintiffs' efforts to respond to Defendants' arguments within the court-mandated time-frame, as the situation has required Plaintiffs to take on additional family responsibilities and has hindered them in the conduct of regular business. In addition, Plaintiffs are both under stay-at-home orders in their home counties, which have prevented them from conducting legal research (law libraries are also closed).

Plaintiffs have contacted defense counsel who have agreed not to oppose this motion.

Therefore, Plaintiffs respectfully ask this Honorable Court to grant a 30-day extension.

Dated April 17, 2020.

Respectfully Submitted,



4.14.2020

Gregory Conte



4/17/20

Warren Balogh

C E R T I F I C A T E

I hereby certify that on the 17th day of April, 2020, I sent the foregoing to the Clerk of the Court by first class mail, which will send notification of such filing to all counsel of record.

I hereby certify that I have mailed by United States Postal Service the document to the following:

Robert B. McEntee, III (VSB No. 89390),
Erin R. McNeill (VA Bar No. 78816),
and Madeline M. Gibson (VSB No. 87561)
Assistant Attorneys General
Office of the Virginia Attorney General
202 North 9th Street
Richmond, Virginia 23219
(Representing the Commonwealth, Virginia State Police, Terence McAuliffe, Brian Joseph Moran, Steven Flaherty, and Becky Crannis-Curl)

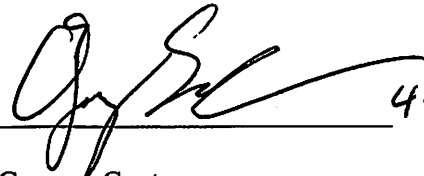
Richard H. Milnor VSB 14277
414 Park Street
Charlottesville, VA 22902 4349770191
(Representing the City of Charlottesville and Charlottesville Police Department)

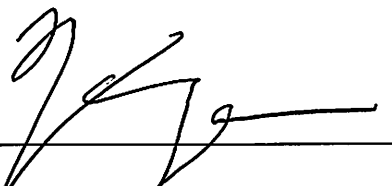
David P. Corrigan (VSB No. 26341)
and Melissa Y. York (VSB No. 77493)
Harman, Claytor, Corrigan & Wellman
P.O. Box 70280
Richmond, Virginia 23255
(representing Al Thomas, Jr. and Wes Bellamy)

Rosalie Pemberton Fessier VSB 39030
Timberlake Smith
25 North Central Avenue
P.O. Box 108 Staunton VA 24402
(Representing Wes Bellamy)

Dated April 17, 2020.

Respectfully Submitted,


4.14.2020
Gregory Conte


4/17/20
Warren Balogh